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May 20, 2025

VIA ECF

The Honorable George B. Daniels
 U.S. District Judge
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street
 New York, NY 10007

The Honorable Sarah Netburn
 U.S. Magistrate Judge
 United States District Court
 Southern District of New York
 Thurgood Marshall U.S. Courthouse
 40 Foley Square, Room 430
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judges Daniels and Netburn:

As the Court knows, the United States Victims of State Sponsored Terrorism (USVSST) Fund has announced a deadline of June 1, 2025 for applicants to be eligible to participate in the next round of distribution, to begin in 2026. *See* ECF 10845.

Understanding that this MDL demands substantial judicial attention and is only one of many matters on the Court's docket, we are providing a table listing those motions that are still pending, intending to facilitate the Court's review and, we hope, on behalf of those 9/11 family members whose motions are pending, obtain judgments prior to the June 1, 2025 deadline if at all possible. Based on our review of the filings, we believe that the below motions filed by our law firms, which represent about 95% of the families of those killed in the 9/11 Terrorist Attacks, remain outstanding, listed by date filed, oldest to newest:

	Date Filed	MDL ECF No.	Related Civil No.	Type of Claim
1.	2020/04/06	ECF 6123 (correcting ECF 6047)	<i>Ashton et al.</i> 02-cv-6977	Solatiums (Functional Equivalent) ¹
2.	2024/09/09	ECF 10326	<i>Rivelli, et al.</i> v. 18-cv-11878; <i>Rowenhorst, et al.</i> 18-cv-12387	Solatiums (Non- U.S. Nationals) ²

¹ This is an objection to a Report & Recommendation submitted with further evidence as to one of the movants, pursuant to Fed. R. Civ. P 72(b) and 28 U.S.C. § 636(b)(1)(C). ECF 6219-1.

² Unless noted otherwise, the claims are made on behalf of U.S. Nationals.

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3.	2024/09/16	ECF 10362	<i>Burnett et al.</i> 15-cv-9903	“Day Of” Personal Injuries
4.	2024/10/15	ECF 10424	<i>Burnett et al.</i> 15-cv-9903	9/11 Decedent Estates (Non-U.S. Nationals)
5.	2024/11/01	ECF 10478	<i>Hemenway et al.</i> 18-cv-12277; <i>King et al.</i> 22-cv-5193	9/11 Decedent Estates (Non-U.S. Nationals)
6.	2024/11/12	ECF 10524	<i>Morris et al.</i> 18-cv-5321; <i>Schlissel et al.</i> 18-cv-5331; <i>Ades, et al.</i> 18-cv-07306; <i>Abel Sr., et al.</i> 18-cv-11837 ; <i>Jimenez, et al.</i> 18-cv-11875; <i>Rivelli, et al.</i> 18-cv-11878; <i>Hemenway, et al.</i> 18-cv-12277; <i>Rowenhorst, et al.</i> 18-cv-12387 ; <i>BNY Mellon, et al.</i> 19-cv-11767; <i>Bernaerts, et al.</i> 19-cv-11865 ; <i>Hargrave, et al.</i> 20-cv-09387; <i>Asaro, et al.</i> 20-cv-10460; <i>Amato, et al.</i> 21-cv-10239; <i>King, et al.</i> 22-cv-05193; <i>Strauss, et al.</i> 22-cv-10823; <i>Kone, et al.</i> 23-cv-05790; <i>Lopez, et al.</i> 23-cv-08305	9/11 Decedent Estates and Solatiums
7.	2024/12/06	ECF 10583	<i>Burnett et al.</i> 15-cv-9903	9/11 Decedent Estates and Solatiums
8.	2024/12/11	ECF 10619	<i>Burnett et al.</i> 15-cv-9903	9/11 Decedent Estates
9.	2025/02/26	ECF 10740	<i>Burnett et al.</i> 15-cv-9903	Solatiums (Non-U.S. Nationals)
10.	2025/02/26	ECF 10744	<i>Burnett et al.</i> 15-cv-9903	9/11 Decedent Estates

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11.	2025/02/28	ECF 10751	<i>Ashton et al.</i> 02-cv-6977	“Day Of” Personal Injury (Non-U.S. National) ³
12.	2025/03/07	ECF 10772	<i>Burnett et al.</i> 15-cv-9903	“Day Of” Personal Injuries
13.	2025/03/26	ECF 10808	<i>Burnett et al.</i> 15-cv-9903	Solatiums (Non-U.S. Nationals)
14.	2025/03/28	ECF 10814	<i>Burnett et al.</i> 15-cv-9903	9/11 Decedent Estates and Solatiums
15.	2025/04/01	ECF 10822	<i>Burnett et al.</i> 15-cv-9903; <i>Schlissel et al.</i> 18-cv-5331; <i>Moody-Theinert, et al.</i> 18-cv-11876; <i>Rivelli, et al. v.</i> 18-cv-11878; <i>Aamoth, Sr., et al.</i> 18-cv-12276; <i>Hemenway et al.</i> 18-cv-12277; <i>Rowenhorst, et al.</i> 18-cv-12387; <i>BNY Mellon, et al.</i> 19-cv-11767; <i>Bodner, et al.</i> 19-cv-11776; <i>Bernaerts, et al.</i> 19-cv-11865; <i>Hargrave, et al.</i> 20-cv-09387; <i>King, et al.</i> 22-cv-05193; <i>Strauss, et al.</i> 22-cv-10823; <i>Kone, et al.</i> 23-cv-05790; <i>Fennelly</i> 23-cv-10824	9/11 Decedent Estates and Solatiums
16.	2025/04/03	ECF 10827	<i>Ashton et al.</i> 02-cv-6977	9/11 Decedent Estate and Solatiums
17.	2025/04/10	ECF 10854	<i>Burnett et al.</i> 15-cv-9903	9/11 Decedent Estates
18.	2025/04/17	ECF 10879	<i>Burnett et al.</i> 15-cv-9903	Solatiums
19.	2025/04/17	ECF 10883	<i>Morris et al.</i> 18-cv-5321; <i>Ades, et al.</i> 18-cv-07306; <i>Aamoth, Sr., et al.</i> 18-cv-12276;	9/11 Decedent Estates and Solatiums

³ On March 17, 2025, Judge Netburn recommended granting this motion (*see* ECF 10790) and plaintiffs have advised the Court that they have no objections to Judge Netburn’s Report & Recommendation. ECF 10923.

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			<i>Hemenway et al.</i> 18-cv-12277; <i>Bianco et al.</i> 20-cv-10902; <i>King, et al.</i> 22-cv-05193; <i>Kone,</i> <i>et al.</i> 23-cv-05790; <i>Kelly et al.</i> 23-cv-07283; <i>Fennelly</i> 23-cv- 10824; <i>Jelnek et al</i> 24-cv- 05520	
20.	2025/04/28	ECF 10901	<i>Burnett et al.</i> 15-cv-9903	9/11 Decedent Estates
21.	2025/04/30	ECF 10905	<i>Ashton et al.</i> 02-cv-6977	9/11 Decedent Estates and Solatiums
22.	2025/04/30	ECF 10909	<i>Ashton et al.</i> 02-cv-6977	Solatiums (Non- U.S. Nationals)
23.	2025/05/01	ECF 10917	<i>Hemenway et al.</i> 18-cv-12277; <i>Bianco et al.</i> 20-cv-10902; <i>King, et al.</i> 22-cv-05193; <i>Jelnek et al</i> 24-cv-05520	9/11 Decedent Estates and Solatiums
24.	2025/05/05	ECF 10932	<i>Ashton et al.</i> 02-cv-6977	9/11 Decedent Estate and Solatiums
25.	2025/05/08	ECF 10941	<i>Burlingame et al.</i> 02-cv-7230	Solatium
26.	2025/05/09	ECF 10945	<i>Ashton et al.</i> 02-cv-6977	Solatiums

This list updates what we provided the Court on April 8, 2025 (when fourteen motions had been filed and were pending) and we do not expect any additional motions to be filed prior to the June 1, 2025 USVSST Fund deadline. The 9/11 family members we represent would appreciate any progress the Court may be able to make prior to June 1, 2025, as in the past the USVSST Fund has refused to extend its deadlines, resulting in the estates of those killed in the 9/11 Terrorist Attacks, their immediate family members and those injured on 9/11 being excluded from the Fund, despite our best efforts to advocate on their behalf.

Respectfully submitted,

KREINDLER & KREINDLER LLP

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